

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Case No. 05CV11780NMG

WESTPORT INSURANCE CORPORATION,

Plaintiff,

v.

RICHARD C. HEIDLAGE; KOTIN CRABTREE  
AND STRONG, LLP; CHARLES N. ZALIS and  
NORTH AMERICAN UNDERWRITING  
MANAGERS, INC.

Defendants.

**KOTIN, CRABTREE & STRONG, LLP'S RULE 16.1(D)(3) CERTIFICATE**

Pursuant to Rule 16.1(D)(3) of the Local Rules of this Court, the defendant Kotin, Crabtree & Strong, LLP and its counsel Nicholas M. Kelley hereby state that they have conferred (a) to review the expected costs of conducting the full course and various alternative courses of the litigation with a view toward establishing a budget for same; and (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs.

Respectfully submitted,

KOTIN, CRABTREE & STRONG, LLP

By

Nicholas M. Kelley, BBO#265640

Kotin, Crabtree & Strong, LLP

One Bowdoin Square

Boston, MA 02114

(617) 227-7031

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